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**VIA FED EX AND E-MAIL**

November 8, 2019

The Honorable Bob Ferguson  
Attorney General of Washington  
1125 Washington Street SE  
P.O. Box 40100  
Olympia, WA 98504-0100

**Re: Request for the Attorney General to Investigate and Institute Legal Proceedings on the Unconstitutionality of Initiative Measure No. 976**

Dear Mr. Attorney General:

We represent a group of Washington taxpayers as well as organizations and entities with taxpayer members and constituents. We request that your office investigate and promptly institute legal proceedings to remedy the constitutional violations arising from Initiative Measure No. 976 ("I-976").

I-976 violates the Washington Constitution on multiple grounds, including but not limited to the following:

First, I-976 violates the single-subject requirement in article II, section 19 of the Washington Constitution. The initiative contains numerous unrelated subjects joined together in a blatant attempt at unlawful "logrolling".

Second, I-976 violates the subject-in-title requirement in article II, section 19 of the Washington Constitution. There is no reference in the I-976 ballot title to many of the subjects within the initiative. Additionally, the title misleadingly suggests that voters will retain the authority to approve vehicle charges, but several provisions of I-976 then repeal statutes that provide for voter-approved charges.

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Third, I-976 violates article II, section 37 of the Washington Constitution because it improperly amends or attempts to amend existing law without setting forth the amendments in full.

Fourth, I-976 violates home rule principles in the Washington Constitution, including the provision in article XI, section 12 that prohibits the state Legislature from imposing local taxes for local matters.

Fifth, I-976 violates article II, section 1 of the Washington Constitution because it exceeds the scope of the initiative power.

Sixth, I-976 violates article I, section 23 of the Washington Constitution in that it impairs multiple preexisting bond and other contracts.

In sum, I-976 is an unconstitutional law designed to mislead voters about its actual provisions and to interfere with funding mechanisms and projects previously approved by local governments and/or voters. We therefore request that you pursue immediate measures to address the unconstitutional provisions of I-976. *See Farris v. Munro*, 99 Wn.2d 326, 329, 662 P.2d 821 (1983) (allowing a taxpayer to demand that the Attorney General bring suit on behalf of all taxpayers).

Please let us know at your earliest convenience whether your office will initiate legal proceedings against I-976.

Sincerely yours,

PACIFICA LAW GROUP LLP

A handwritten signature in blue ink, appearing to read "M. Segal", followed by a horizontal line.

Matthew J. Segal  
Jessica A. Skelton

cc: Noah Purcell, Solicitor General for the Washington State Attorney General's Office